

Monday 26 February 2018

Dear Animal Health Australia,

Thank you for allowing us the opportunity to present our views in the public consultation for the standards and guidelines of poultry animal welfare.

Pace Farm is a 100% Australian, family owned and operated company, providing eggs for more than 35 years.

Pace Farm is one of Australia's leading supplier, marketer and distributor of eggs and egg products. We are proud to be the preferred ingredient for many national and international hotels, restaurants, food manufacturers and family kitchens.

At Pace Farm we believe in providing the freshest, tastiest and most enjoyable eggs possible; that's why we own every step of the process, from the farm gate to the central warehouse. We've invested heavily in developing innovative, state of the art facilities to exceed worldwide standards in flock care, product quality, environmental impact and biosecurity.

Pace Farm employs over 550 personnel throughout our 20+ layer production and packing facilities across eastern Australia, mainly in rural communities.

Our farms are regularly subject to independent audits to ensure their compliance with national and international accreditation schemes, including HACCP, government accredited salmonella monitoring, and Egg Corp Assured, Australia's national egg quality assurance scheme.

Best practice is part of who we are and it's a core part of what we do. That's one of the reasons that **Pace Farm supports the standards being mandated – which is detailed in the RIS as Option C.**

We view the standards as drafted as an important step forward in ensuring all egg farmers abide by the rules and specifically, that those with direct responsibility for the care of our hens are held accountable in law. Our business works hard on staff development and it would be appropriate for the Government to endorse Option C. This may see other farmers across Australia invest in staff development in a manner consistent with Pace Farm's best practice program.

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Animal welfare and in particular hen welfare is critical to the success of our business and the livelihood of our many employees, and therefore is a priority in all of our decision making.

Pace Farm produces eggs across the cage, free range and barn segments. Based on the science and our experience over several generations, the modern cage system is the most efficient, hygienic and biosecure production method due to the fact that hens are separated from their droppings, live in environment controlled conditions and are provided with a scientifically balanced diet.

In view of recent human health impacts through avian influenza outbreaks throughout Asia and around the world, consideration must be given to housing our livestock in the most biosecure manner possible, ensuring the health of livestock and of humans within Australia.

Cage production is a cost effective method of intensive farming, supplying the majority of eggs at an affordable price to the Australian consumer. Cage systems by nature have a number of advantages, for not only bird health but for a healthy work environment for employees, as dust levels are generally lower than barn or free range production, and there is more automation.

Hens in cage farming systems experience the following welfare benefits including:

- consistently low level of health issues and rates of mortality;
- better protection from hen in-fighting and cannibalism, due to smaller group sizes;
- reduced need for veterinary medications and interventions;
- minimised stress associated with bird handling;
- lower occurrences of manure-borne diseases, parasites, avian influenza and other exotic diseases due to tighter biosecurity;
- easier identification and treatment of sick hens, should they become unwell; and
- protection from the elements and predators like eagles, snakes, foxes and feral cats.

We find it very disappointing the animal welfare/activist movement is using false and misleading imagery which unfairly depicts modern cage farming system in Australia. The use of these decades-old photos and film of cage systems that are no longer used or exist is hurtful to the integrity of our family, our employees and the greater industry at large.

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Australians are already consuming over 100 million eggs per week, and with our population estimated to grow by 30% over the next 20 years, the need for intensive farming systems to cater for affordable protein will become more critical. The modern cage farming system has proven to be the most efficient and effective production method in ensuring food security for many decades, and should continue into the future.

If Governments are serious about ensuring food security as well as reducing the burden on our health system into the future, then affordable protein sources must be encouraged, not demonised. Responsible, modern cage egg farming can supply the most affordable protein base to our population, from infant to adult, and at the same time can do so with the smallest environmental footprint of all egg farming methods.

Yours faithfully,



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